

1 **REMARKS/ARGUMENTS**

2 Claims 1-24 were originally pending. Claims 1 and 5 have been amended.
3 No claims have been added, canceled, or withdrawn. Thus, claims 1-24 remain
4 pending. At least for the reasons discussed below, withdrawal of the outstanding
5 rejections to the pending claims is respectfully requested.

6 **Claim Amendments**

7 Claims 1 and 5 have been amended. These claim amendments are made to
8 impart precision to the claims (e.g., by more particularly pointing out the
9 invention, rather than to avoid prior art), and thereby, expedite the prosecution of
10 this matter. For example, the preamble of claim 1 has been amended to more
11 particularly show that operations associated with claim 1 are implemented at least
12 in part by a computer. More specifically, the preamble of claim 1 was amended to
13 change “[a] method for enumerating applications” to “[a] method implemented at
14 least in part by a computing device for enumerating applications”. Additionally,
15 claim 5 was amended to correct a grammatical error. More specifically, claim 5
16 was amended to change “responsive receiving the discovery response” to
17 “responsive to receiving the discovery response”.

19 **35 USC §102(e) Rejections**

20 Claims 1-24 stand rejected under 35 USC 102(e) as being anticipated by
21 U.S. patent application publication number 2003/0217166 to Dal Canto. This
22 rejection is traversed.

23 A fundamental aspect of 35 USC §102(e) is that a claim is anticipated only
24 if each and every element as set forth in the claim is described in a single prior art
25

1 reference (MPEP §2131.01). Dal Canto does not describe each and every feature
2 of claims 1-24 for the following reasons.

3 **Claim 1** recites “sending a remote application discovery request to a Web
4 service, the Web service being deployed on a remote applications publication
5 (RAP) Web server in the Intranet, the remote application discovery request being
6 sent to the Web service by the remote client computer via a public network
7 coupling the remote client computer to the Web server”, and “responsive to the
8 sending, receiving a discovery response from the Web service, the discovery
9 response identifying at least one application installed on the Intranet for terminal
10 server (TS) based access by a user of the remote client computer.” The Action
11 asserts that these recited features are disclosed at paragraphs 47, 48 and 49 of Dal
12 Canto. Applicant respectfully disagrees.

13 Paragraphs 47, 48, and 49 of Dal Canto disclose that a remote
14 authentication service module **210** (Fig. 1), which is a component of a network
15 operations center (NOC) **200**, “establishes a secure device connection” between
16 the NOC and “the requesting client device **400** to display the client-specific
17 customized Meta-Desktop on the requesting client device **400**” ([0048]). The user
18 interface presents icons representing various services that are not implemented by
19 the NOC, but instead are implemented by one or more servers **330** on a remote
20 service center **300**. The Meta-Desktop generated by the NOC and sent by the
21 NOC to the client, allows a user of the client device **400** to select a service of
22 interest, obtain a service connection with a service center **300** that runs the
23 selected service, and receive rendering commands for client **400** to “display
24 human perceptible output” ([0042] and [0052]) of the selected service. Dal Canto
25 at [0041] expressly discloses that these rendering commands are not “data”

1 associated with the selected service because “the data never exits the service
2 center **300**. [...] With the service provisioning system architecture **100**, businesses
3 and corporations no longer need to purchase and maintain desktop or laptops,
4 provide technical and software support at the individual client device location.”
5 These teachings do not describe each and every feature of claim 1 for at least the
6 following reasons.

7 The cited portion of Dal Canto, and Dal Canto as a whole, does not disclose
8 “sending a remote application discovery request to a Web service” or “receiving a
9 discovery response”, as claim 1 recites. Instead, the only requests and responses
10 disclosed by Dal Canto are *device and user authentication requests* sent by the
11 client device **400** to the NOC **200**. More particularly, Dal Canto at [0043] through
12 [0046] expressly describes that a client device **400** sends an authentication request
13 to a network operations center **200** (NOC) as part of operations to establish secure
14 communications with the NOC. Dal Canto at [0055] expressly describes that
15 these request/response communications are “public key transactions” to
16 authenticate the client device 400 and a corresponding user. Clearly, an
17 authentication request of Dal Canto is not “a remote application discovery
18 request”, as claim 1 recites. Moreover, it is plain that these NOC’s authentication
19 operations are not a “Web service being deployed on a remote applications
20 publication (RAP) Web server” as claim 1 recites.

21 With respect to Dal Canto’s service center **300**, Dal Canto expressly
22 discloses at [0051] that “no client devices 400 can call into or initiate connections
23 to the service center **300**”. Instead, when a user of a client device **400** selects a
24 service from the NOC **200** provided Meta-Desktop, the NOC **200** uses the
25 established secure connection to establish a new “*device or render connection*”

1 between a server **330** at the service center **300** and the client device **400**. Dal
2 Canto describes at [0052] that after “the NOC **200** initiates the establishment of a
3 session between a particular service center **300** and the client device **400**, the
4 requesting client device **400** transmits *user inputs* to the appropriate service center
5 **300**” (emphasis added). And, “[t]he service center **300** transmits the *rendering*
6 *commands* [i.e., over the “render connection”] to the client device **400**” (emphasis
7 added).

8 Dal Canto at [0058] indicates that digital data received from the client
9 device **400** is keystroke and/or mouse inputs. At [0042] Dal Canto discloses that
10 the client device **400** merely receives and displays “human perceptible output” of a
11 service and that a client transmits “basic, atomic inputs” to the service. Clearly,
12 these “user inputs” and “basic, atomic inputs” respectively communicated between
13 a client device **400** to a service center **300** do not disclose “a remote application
14 discovery request”, as claim 1 recites. Moreover, it is plain that the “rendering
15 commands” sent to the client device **400** by the service center **300** responsive to
16 receipts of the client device transmitted user inputs do not disclose “responsive to
17 the sending, receiving a discovery response”, as claim 1 recites. For at least these
18 reasons, Dal Canto does not describe each and every element as set forth in
19 claim 1.

20 Additionally, the authentication responses sent to the client **400** by the
21 NOC **200** of Dal Canto, and the “rendering commands” sent to the client **400** by
22 the service center **300** do not disclose that anything “identify[ies] at least one
23 application installed on the Intranet for terminal server (TS) based access by a user
24 of the remote client computer”, as claim 1 recites. For a user of a client device to
25 engage in “terminal server (TS) based access by a user of the remote client

1 computer”, terminal server support applications and/or hardware will necessarily
2 be present on the “remote client computer”. Otherwise, the user will not be able to
3 engage in “terminal server (TS) based access by a user of the remote client
4 computer”, as claim 1 recites. In contrast to these necessarily present aspects, Dal
5 Canto’s client device **400** may never include such terminal service application
6 support or hardware. More particularly, Dal Canto at [0017] expressly discloses a
7 system that “allows delivery of any digital service to a remote location without
8 requiring a local copy of the data, any application, or supportive hardware.”

9 Moreover, Dal Canto at [0041] expressly discloses that these rendering
10 commands are not “data” associated with the selected service because “the data
11 never exits the service center **300**. [...] With the service provisioning system
12 architecture **100**, businesses and corporations *no longer need to purchase and*
13 *maintain desktop or laptops, provide technical and software support at the*
14 *individual client device location*” (emphasis added) Thus, Dal Canto’s client
15 device **400** may never be able to engage in a terminal services session with any
16 service or application installed on a service center **300**.

17 Applicant respectfully submits that Dal Canto purposefully designed the
18 client device **400** to be completely independent of “terminal server (TS) based
19 access”, as claim 1 recites, because Dal Canto at [0012] expressly discloses that
20 such terminal server based client device access is problematic. More specifically,
21 “WTS [WINDOWS Terminal Services] software impose considerable processing
22 load on the client PC, and are vulnerable to network faults and security breaches,
23 such as “man-in-the-middle” attacks.” Thus, a system of Dal Canto may never
24 “responsive to the sending, receiving a discovery response from the Web service”,
25 “the discovery response identifying at least one application installed on the

1 Intranet for terminal server (TS) based access by a user of the remote client
2 computer”, as claim 1 recites.

3 For these additional reasons, Dal Canto does not describe each and every
4 element as set forth in claim 1. Since Dal Canto does not describe each and every
5 element as set forth in claim 1, Dal Canto cannot anticipate claim 1. Accordingly,
6 the 35 USC §102(e) rejection of claim 1 as anticipated by Dal Canto is improper
7 and should be withdrawn.

8 **Claims 2-6** depend from claim 1 and are allowable over Dal Canto solely
9 by virtue of this dependency. Accordingly, the 35 USC §102(e) rejection of
10 claims 2-6 should be withdrawn.

11 Additionally, claims 2-6 further include features that are not expressly or
12 inherently described by Dal Canto.

13 For example, claim 2 recites “wherein the sending and receiving are
14 independent of a Virtual Private Network connection between the remote client
15 computer and the Intranet.” In addressing these claimed features, the Action
16 asserts they are disclosed by Dal Canto at paragraphs 10 and 14. Applicant
17 respectfully disagrees. Although Dal Canto describes at paragraph 10 that a VPN
18 connection requires expensive VPN termination equipment and client software,
19 Dal Canto at paragraph [0035] expressly discloses that the preferred
20 implementation to ensure user authentication “preferably comprises a virtual
21 private network [VPN] surface to segregate data traffic and to provide a high level
22 of network performance.” Thus, a system of Dal Canto does not anticipate
23 “wherein the sending and receiving are independent of a Virtual Private Network
24 connection between the remote client computer and the Intranet”, as claim 2
25 recites.

1 For this additional reason, the 35 USC §102(e) rejection of claim 2 as
2 anticipated by Dal Canto is improper and should be withdrawn.

3 In another example, claim 4 recites “wherein the at least one application is
4 multiple applications, respective ones of the multiple applications having been
5 published by multiple information sources on the Intranet, the multiple
6 information sources comprising one or more of a directory service, a Systems
7 Management Server (SMS), and an office computer associated with the user.” In
8 addressing these claimed features, the Action asserts they are disclosed by Dal
9 Canto at paragraph 40. Applicant respectfully disagrees.

10 Paragraph 40 of Dal Canto is completely silent on any disclosure with
11 respect to “a directory service, a System Management Server (SMS)”, as claim 4
12 recites. Instead, paragraph 40 merely indicates that a service center 300 may
13 support a given service “such as video conference, Internet protocol (IP)
14 telephony, voice messaging, cable television, digital music, digital movie,
15 e-commerce, etc.” by wrapping existing native protocols within an appropriate
16 remote interactive protocol. Clearly, nowhere do these teachings expressly
17 disclose or indicate as necessarily present the claimed “the multiple information
18 sources comprising one or more of a directory service, a Systems Management
19 Server (SMS), and an office computer associated with the user”, as claim 4 recites.

20 For at least these additional reasons, the 35 USC §102(e) rejection of claim
21 4 is improper and should be withdrawn.

22 In another example, claim 5 recites “wherein responsive to receiving the
23 discovery response from the Web service, the remote client computer presents
24 respective shortcuts to the user, each shortcut corresponding to an individual one
25 of remote applications identified in the discovery response, each shortcut being

1 selectable by the user to invoke a terminal service, the terminal service executing a
2 corresponding remote application on an associated installation point on the
3 Intranet.” In addressing these claimed features, the Action asserts that they are
4 disclosed by Dal Canto at paragraphs 49 and 51. Applicant respectfully disagrees.

5 Dal Canto at paragraph 49 merely discloses that a “Meta-Desktop” presents
6 icons representing various services available to a user of a client device. Nowhere
7 do these teachings of paragraph 49 disclose that any such available service is
8 “selectable by the user to invoke a terminal service”, as claim 5 recites. As
9 already discussed, Dal Canto at [0041] expressly describes that “[w]ith the service
10 provisioning system architecture 100, businesses and corporations no longer need
11 to purchase and maintain desktop or laptops, provide technical and software
12 support at the individual client device location.” Applicant respectfully submits
13 that if there is no software support for terminal services at Dal Canto's client
14 device 400, a user of the client device 400 will not be able to engage in a terminal
15 service session involving any service or application installed on a service center
16 300. This is in accordance with the disclosure of Dal Canto. Dal Canto at [0012]
17 expressly discloses that terminal server based client device access is problematic
18 and that the system of Dal Canto is independent of the ability of any user of a
19 client device 400 to engage in terminal services or the need for any entity to invest
20 in the hardware/software infrastructure needed to implement terminal services
21 between a server and a client. For at least these reasons, these teachings of [0049]
22 are completely silent with respect to the recited features of claim 5.

23 With respect to paragraph [0051], Dal Canto merely discloses that once a
24 user selects a particular service, an NOC 200 independent of a service center 300
25 that implements the selected service uses an already established secure connection

1 with the client device **400** to open a render connection between the client device
2 and the service center **300**. The service center **300** uses the render connection to
3 convert “format (resolution, color depth, keystrokes, mouse cord etc.) appropriate
4 for each client device **400** for any of the digital services available on the service
5 center **300**.” Clearly, this cited disclosure of Dal Canto is completely silent with
6 respect to “wherein responsive to receiving the discovery response from the Web
7 service, the remote client computer presents respective shortcuts to the user, each
8 shortcut corresponding to an individual one of remote applications identified in the
9 discovery response, each shortcut being selectable by the user to invoke a terminal
10 service, the terminal service executing a corresponding remote application on an
11 associated installation point on the Intranet”, as claim 5 recites.

12 For each of these additional reasons, withdrawal of the 35 USC §102(e)
13 rejection of claim 5 is respectfully requested.

14 **Claim 7** recites “sending a remote application discovery request to a Web
15 service, the Web service being deployed on a remote applications publication
16 (RAP) Web server in the Intranet, the remote application discovery request being
17 sent to the Web service by the remote client computer via a public network
18 coupling the remote client computer to the Web server”, and “responsive to the
19 sending, receiving a discovery response from the Web service, the discovery
20 response identifying at least one application installed on the Intranet for terminal
21 server (TS) based access by a user of the remote client computer.” For the reasons
22 already discussed above with respect to claim 1, Dal Canto does not anticipate
23 these recited features of claim 7.

24 Accordingly, the 35 USC 102(e) rejection of claim 7 as anticipated by Dal
25 Canto is improper and should be withdrawn.

1 **Claims 8-12** depend from claim 7 and are allowable over Dal Canto solely
2 by virtue of this dependency. Accordingly, and at least for these reasons, the 35
3 USC §102(e) rejection of claims 8-12 should be withdrawn.

4 Additionally, for the reasons already discussed above with respect to claims
5 2 and 4-5, respective ones of claims 8, 10, and 11 recite additional features that are
6 not anticipated by Dal Canto. For those additional reasons the 35 USC 102(e)
7 rejection of claims 8, 10, and 11 should be withdrawn.

8 **Claims 13** recites “sending a remote application discovery request to a
9 Web service, the Web service being deployed on a remote applications publication
10 (RAP) Web server in the Intranet, the remote application discovery request being
11 sent to the Web service by the remote client computer via a public network
12 coupling the remote client computer to the Web server”, and “responsive to the
13 sending, receiving a discovery response from the Web service, the discovery
14 response identifying at least one application installed on the Intranet for terminal
15 server (TS) based access by a user of the remote client computer.” For the reasons
16 already discussed above with respect to claim 1, Dal Canto does not anticipate
17 these recited features of claim 13.

18 Accordingly, the 35 USC 102(e) rejection of claim 13 as anticipated by Dal
19 Canto is improper and should be withdrawn.

20 **Claims 14-18** depend from claim 13 and are allowable over Dal Canto
21 solely by virtue of this dependency. Accordingly, and at least for these reasons,
22 the 35 USC §102(e) rejection of claims 14-18 should be withdrawn.

23 Additionally, for the reasons already discussed with respect to claims 2, 4,
24 and 5, the additional features recited by claims 14, 16, and 17 are not anticipated
25 by Dal Canto.

1 For these additional reasons the 35 USC 102(e) rejection of claims 14, 16,
2 and 17 should be withdrawn.

3 **Claim 19** recites “means for sending a remote application discovery request
4 to a Web service, the Web service being deployed on a remote applications
5 publication (RAP) Web server in the Intranet, the remote application discovery
6 request being sent to the Web service by the remote client computer via a public
7 network coupling the remote client computer to the Web server”, and “means for
8 responsive to the sending, receiving a discovery response from the Web service,
9 the discovery response identifying at least one application installed on the Intranet
10 for terminal server (TS) based access by a user of the remote client computer.”

11 For the reasons already discussed above with respect to claim 1, Dal Canto does
12 not anticipate these recited features of claim 19.

13 Accordingly, the 35 USC 102(e) rejection of claim 19 as anticipated by Dal
14 Canto is improper and should be withdrawn.

15 **Claims 20-24** depend from claim 19 and are allowable over Dal Canto
16 solely by virtue of this dependency. Accordingly, and at least for these reasons,
17 the 35 USC §102(e) rejection of claims 20-24 should be withdrawn.

18 Additionally, for the reasons described above with respect to claims 2, 4,
19 and 5, the additional features of claims 20, 22, and 23 are not anticipated by Dal
20 Canto.

21 For these additional reasons the 35 USC 102(e) rejection of claims 20, 22,
22 and 23 should be withdrawn.

Conclusion

Pending claims 1-24 are in condition for allowance. Applicant respectfully requests action to this end. Should any issue remain that prevents allowance of the application, the Office is encouraged to contact the undersigned prior or issuance of a subsequent Office action.

Respectfully Submitted,

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